



STATE OF CONNECTICUT
DEPARTMENT OF EDUCATION



TO: Sponsors of School Child Nutrition Programs

FROM: John Frassinelli, Chief
Bureau of Health/Nutrition, Family Services and Adult Education

DATE: December 15, 2014

SUBJECT: Operational Memorandum #10-15
Guidance for Accepting Processed Product Documentation for Meal Pattern Requirements, REVISED

This memorandum replaces the Connecticut State Department of Education's (CSDE) [Operational Memorandum #21-13](#), dated March 13, 2013. The purpose of this memorandum is to:

- update references to clarify common issues related to inaccurate or misleading product literature, product labels and factsheets;
- provide guidance about how product literature can be used to make purchasing decisions; and
- share sample product formulation statements that can be used to document a product's contribution to meal pattern requirements.

Factsheets and product labels provide a way for food manufacturers to communicate with program operators regarding how their products may contribute to the meal pattern requirements for meals served under the Department of Agriculture's (USDA) Child Nutrition (CN) Programs. The USDA Food and Nutrition Service (FNS) frequently receives inquiries about inaccurate or misleading product literature, product labels, and factsheets.

CN LABELED PRODUCTS

Schools and other program operators are not required to offer processed products with CN labels. However, it is important to recognize that **CN labeled products provide an assurance that foods provide the stated contributions toward CN meal pattern requirements.** CN labeled products are processed under a Quality Control plan administered by USDA's Agricultural Marketing Service or Department of Commerce (USDC) National Marine Fisheries Service using guidelines provided by FNS. CN labels are only available for items that contribute toward the meat/meat alternates component of the meal pattern. For more information on the USDA's CN labeling Program, visit <http://www.fns.usda.gov/cnd/cnlabeling/default.htm>.

Program operators must keep records of the original CN label from the product carton. If the actual CN label is laser printed on the product carton or cannot be easily removed, then a photocopy of the valid CN label may be provided as acceptable documentation during an administrative review. A photograph of the CN label while it is attached to the product carton is also acceptable documentation. CN labels that are photocopied or photographed must be visible and legible.

Since CN labeled products provide program operators with a warranty against audit claims when the product is used according to the manufacturer's instructions, CSDE school nutrition consultants cannot request a product formulation statement when the school food authority provides a valid CN label logo and crediting statement during an administrative review.

The FNS is currently working with the Agricultural Marketing Service to develop a CN label verification system. This system will assist state reviewers during the administrative review, to verify the status of a CN label as well as the corresponding contribution statement. The expected completion date for this verification system is fall 2015.

PRODUCT FORMULATION STATEMENTS AND OTHER DOCUMENTATION

When purchasing a processed product without a CN label, program operators may request a signed product formulation statement on manufacturer's letterhead that demonstrates how the processed product contributes to the meal pattern requirements. Program operators must maintain files of nutrient information to meet the requirements of program regulations in 7CFR 210 and 220. If the processed product does not have a Nutrition Facts panel, the program operator must obtain nutrient information from the manufacturer.

Program operators are ultimately responsible if a menu does not fulfill meal pattern requirements and must therefore keep records of supporting documentation. **It is the program operator's responsibility to request and verify that the supporting documentation is accurate.**

GENERAL GUIDANCE FOR REVIEWING PRODUCT FORMULATION STATEMENTS

An appropriate product formulation statement will provide specific information about the product and show how the food credits toward the school meal patterns, citing Child Nutrition Program resources and regulations. Program operators must review this information for accuracy using the steps below.

1. Review product formulation statements prior to purchasing processed products.

The USDA has several resources that can help program operators with this process, including a reviewer's checklist and sample product formulation statements. Program operators should refer to these resources when reviewing product formulation statements prior to purchasing processed products.

- *Reviewer's Checklist for Evaluating Manufacturer Product Formulation Statements (Product Analysis) for Meat/Meat Alternate (M/MA) Products:*
http://www.fns.usda.gov/sites/default/files/reviewer_checklist.pdf
- Product formulation statement templates for documenting the meat/meat alternates, grains, fruits and vegetables components are available on the USDA's [Food Manufacturers/Industry](#) Web page or the direct links below.
 - *Product Formulation Statement for Meat/Meat Alternate Products:*
<http://www.fns.usda.gov/sites/default/files/PFSmma.pdf>
 - *Product Formulation Statement for Documenting Vegetables and Fruits:*
<http://www.fns.usda.gov/sites/default/files/PFSfv.pdf>

- *Sample Completed Product Formulation Statement for Vegetables:*
<http://www.fns.usda.gov/sites/default/files/PFSsamplevegetables.pdf>
- *Sample Completed Product Formulation Statement for Fruits:*
<http://www.fns.usda.gov/sites/default/files/PFSsamplefruits.pdf>
- *Product Formulation Statement for Grains:*
<http://www.fns.usda.gov/sites/default/files/PFSgrains13-14.pdf>
- *Sample Completed Product Formulation Statement for Grains:*
<http://www.fns.usda.gov/sites/default/files/PFSsamplegrains.pdf>
- Specific policies for alternate protein products and food-based menu planning are available in the USDA's handout, "*Questions and Answers on Alternate Protein Products (APP)*," available at
<http://www.fns.usda.gov/sites/default/files/APPindustryfaqs.pdf>.

Program operators can use these documents to determine how a product credits toward the meat/meat alternates grains, fruits and vegetables components of the meal pattern requirements.

Manufacturers may need to modify product formulation statements for various types of commercial products. For example, cheese pizza could have crediting information for the red/orange vegetable subgroup in addition to the meat/meat alternates and grains components. Manufacturers may document the crediting information for each meal component on the same product formulation statement. The manufacturer must clearly identify how each component contributes to the meal pattern requirements.

2. **Verify the accuracy of the product formulation statement.** To verify the accuracy of a product formulation statement, program operators should consider the information below.
 - **Determine that the creditable ingredients listed in the product formulation statement match a description in the *Food Buying Guide for School Meal Programs* (FBG).** If a product formulation statement for a specific product claims to provide a higher meal component credit than the amount listed in the FBG, the product formulation statement must clarify all credited ingredients and demonstrate how the product provides that credit according to USDA regulations, guidance or policy.
 - **Verify that the credit a product contributes to meal pattern requirements is not greater than the serving size of the product.** For example, a 2.2-ounce beef patty cannot credit for more than 2 ounce equivalents of meat/meat alternates.
 - **Assure that the creditable components are visible in the finished product.** For example, fruit-filled pancakes cannot credit toward the meat/meat alternates component because a meat/meat alternate component is not visible. To claim a meat/meat alternates contribution, the product must have a visible meat or meat alternate such as a sausage link, beans, cheese or peanut butter, and the method for crediting these items must be specified in the product formulation statement.

The USDA encourages program operators to review product literature carefully, since school food authorities are responsible if the meals they serve do not meet meal pattern requirements. **Any crediting information received from a manufacturer other than a valid CN label should be checked by the school food authority or other program operator for accuracy prior to the item being included in the reimbursable meal.**

The attached handout, *Accepting Processed Product Documentation*, summarizes the guidance to assist school food authorities with obtaining and evaluating acceptable documentation for commercial food products used in school meals. It is also available on the CSDE's Web site at http://www.sde.ct.gov/sde/lib/sde/pdf/deps/nutrition/crediting/prod_doc.pdf.

Questions may be directed to:

COUNTY ASSIGNMENTS	CONSULTANT	E-MAIL AND PHONE
Fairfield County	Fionnuala Brown	fionnuala.brown@ct.gov 860-807-2129
Hartford County (towns/cities beginning with A-R)	Teri Dandeneau	teri.dandeneau@ct.gov 860-807-2079
Hartford County (towns/cities beginning with S-W) Windham County	Susan Alston	susan.alston@ct.gov 860-807-2081
Litchfield County	Allison Calhoun-White	allison.calhoun-white@ct.gov 860-807-2008
Middlesex County Tolland County	Andy Paul	andrew.paul@ct.gov 860-807-2048
New Haven County	Jackie Schipke	jackie.schipke@ct.gov 860-807-2123
New London County	Monica Pacheco	monica.pacheco@ct.gov 860-807-2073

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Attachment

Important: This is a numbered Operational Memorandum that contains important program information. Please read carefully and retain in a binder for your future reference. Operational Memoranda are also posted on the Child Nutrition Web site at <http://www.sde.ct.gov/sde/cwp/view.asp?a=2626&q=320676>.